



telefinity

WC DOCKET NO. 05-196

October 21, 2005

URGENT REQUEST

Chairman Kevin Martin
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

with copy to Kevin.Martin@fcc.gov

In Re: FC-05-116
E911 Requirements for IP-Enabled Service Providers
(VoIP and E911 Services)

LETTER OF REQUEST FOR EXTENSION OF THE NOVEMBER 28, 2005 DEADLINE

Chairman Martin,

We provide smaller-sized VoIP telephony providers with an easy-to-implement and low-cost method of providing E911 services to their subscribers.

As you are well aware, it is a major undertaking for a VoIP provider to arrange, establish, implement and maintain the agreements and connections necessary to obtain E911 services for their subscribers. We have a unique relationship with Intrado, Inc. of Longmont, Colorado; some would say that Intrado is the largest, most advanced and the most solid and reliable E911 providers in the United States. The FCC Order referenced above noted Intrado in documentation and the Order.

We are rapidly contracting with and implementing dozens of smaller VoIP providers on to our E911-provisioning network. However, several factors have combined to create a situation for which we are asking - on behalf of customers who have contracted or plan to contract with us for E911 services - for an extension of time of the November 28th, 2005 deadline. These factors include:

- a. The devastating and still-continuing impact of Hurricanes Katrina, Rita and now Wilma. The effects of these hurricanes has disrupted operations and administrative functions of many VoIP providers, making it more difficult for them to organize and implement an E911 solution.
- b. The effects of the Hurricanes have in some instances slowed the delivery of specialized routing, switching and related equipment, and backlogs for delivery are longer than normal. For some providers this has taken a priority over all other important matters.
- c. The inherent complications of implementing a new, developing and still-emerging technology as important as E911 for VoIP. For many VoIP providers this has been a stumbling block, even though they have solid intentions of complying with the FCC order for E911 for VoIP.
- d. After implementation, we find it necessary and critically important to test every operating facet of the E911 solutions implementation, a five-day process.

We have a unique situation in that we are providers of the E911 service for smaller providers who are trying their best to comply with the Order. However, for one reason or another, by November 28, 2005, they won't be able to get implemented and be able offer E911 to their VoIP subscribers.

In the case of our customers, these VoIP companies sign contracts with us pay an initial implementation fee and commit to a multi-year contract for E911 services. So, they are committing financial and other resources in order to comply, but they need a little more time to do so.

Our request to you and the FCC is this: that any VoIP telephony company who has signed a contract with our company for implementation of E911 services - therefore demonstrated their full intention and commitment of complying with the Order - be given a 21-day reprieve; that they be allowed a deadline for compliance until December 19, 2005 instead of November 28, 2005.

We would appreciate your comments on this request as soon as possible – we are working long days and weekends in order to help as many as possible comply with the Order. We just need a little extension on the deadline.

Sincerely,
Telefinity Corporation – Dash911



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